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Admitted NY and NJ

June 11, 2007

Mr. Clay Monroe, Esq.
Assistant Regional Counsel
USEPA - Region 2
290 Broadway, 17th Floor
New York, NY 10007-1866

Re: New England Laminates Company, Inc.
Berry's Creek Study Area ("Berry's Creek")

Dear Mr. Monroe:

This Firm represents New England Laminates Co., Inc. ("Nelco"), which is a member of the Berry's Creek PRP Group. Nelco was identified by the Environmental Protection Agency ("EPA") as a potentially responsible party to the Berry's Creek Study Area ("BCSA"). In the EPA's initial correspondence, Nelco was identified as a "B" and "C" party. The "B" parties were allegedly involved in the Morton International, Ventron/Velsicol Site, and "C" parties were identified as signatories to the Scientific Chemical Processing Site ("SCP Carlstadt") in Carlstadt, New Jersey.

Nelco has previously written to the EPA disputing its identification as a "B" party. At this time, Nelco is writing to formally request that the EPA withdraw its designation of Nelco as a "B" party.

In order to determine the EPA's basis for identifying Nelco as a "B" party, we submitted a FOIA request to EPA for all nexus documents related to Nelco. On June 5, 2007, we reviewed the documents and met with Doug Tomchuk, the Remedial Project Manager for the BCSA. A thorough review of the EPA's file failed to identify any nexus documents or information of any nature identifying Nelco as a contributor to the

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Ventron/Velsicol site. Nelco does not appear on any PRP list or "Waste In" list with regard to the Ventron/Velsicol site and there are no records of any waste shipments from Nelco to the site.

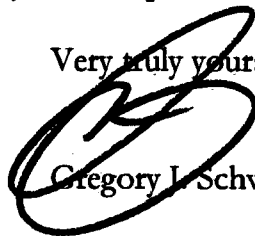
The only mention of Nelco in the EPA's file was as a defendant in the private party cost-recovery action brought in the United States District Court for the District of New Jersey by Morton International, the successor to Ventron and Velsicol. In conversing with Mr. Tomchuk, he offered that the EPA identified Nelco as a "B" party based solely from the Morton complaint.

Given the lack of any nexus information implicating Nelco in the Ventron/Velsicol site, we believe it is appropriate for the EPA to reconsider its designation of Nelco as a "B" party. The Ventron/Velsicol site is contaminated with mercury as a result of mercury processing and reclamation activities on-site. Nelco never sent any wastes to the site and mercury is not part of its waste stream. It is an alleged PRP for the SCP Carlstadt site based upon shipments of liquid waste. Ventron/Velsicol is not known to be contaminated as a result of processing liquid wastes. Regardless, there are no records indicting that Nelco shipped wastes of any nature to Ventron/Velsicol and there is no scientific evidence suggesting that wastes from the SCP Carlstadt site have migrated onto the Ventron/Velsicol site.

Based on the foregoing, Nelco requests that the EPA remove Nelco as a "B" party from the BCSEA.

Thank you. Please call if you have questions or comments.

Very truly yours,

A handwritten signature in black ink, appearing to be "G. Schwartz", enclosed within a large, loopy circular flourish.

Gregory L. Schwartz

cc: Mr. Doug Tomchuk